

IN THE DISTRICT COURT OF THE UNITED STATES

for the Western District of New York

**NOVEMBER 2012 GRAND JURY
(Impaneled 11/9/2012)**

THE UNITED STATES OF AMERICA SUPERSEDING INDICTMENT

-vs-

14-CR-89-A

STACY SAMUELS
(Counts 1-4), and
KARONE JOHNSON
(Counts 1-4)

Violations:
Title 21, United States Code,
Sections 841(a)(1), 846 and 963
(4 Counts and Forfeiture Allegation)

COUNT 1

**(Conspiracy to Possess with Intent to Distribute,
and to Distribute, Methamphetamine)**

The Grand Jury Charges That:

Between in or about 2014, the exact date being unknown, and on or about April 7, 2014, in the Western District of New York, and elsewhere, the defendants, **STACY SAMUELS** and **KARONE JOHNSON**, did knowingly, willfully and unlawfully combine, conspire and agree together and with others, known and unknown, to commit the following offenses, that is, to possess with the intent to distribute, and to distribute, fifty (50) grams or more of methamphetamine, and five hundred (500) grams or more of a mixture and substance containing methamphetamine, Schedule II controlled substances, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

All in violation of Title 21, United States Code, Section 846.

COUNT 2

(Conspiracy to Export Methamphetamine)

The Grand Jury Further Charges That:

Between in or about 2014, the exact date being unknown, and on or about April 7, 2014, in the Western District of New York, and elsewhere, the defendants, **STACY SAMUELS** and **KARONE JOHNSON**, did knowingly, willfully and unlawfully combine, conspire and agree together and with others, known and unknown, to commit the following offense, that is, to export from the United States to a place outside the United States, that is, Canada, fifty (50) grams or more of methamphetamine, and five hundred (500) grams or more of a mixture and substance containing methamphetamine, Schedule II controlled substances, in violation of Title 21, United States Code, Sections 953(c), 960(a)(1) and 960(b)(1)(H).

All in violation of Title 21, United States Code, Section 963.

COUNT 3

**(Possession with Intent to Distribute,
and Distribution of, Methamphetamine)**

The Grand Jury Further Charges That:

On or about March 20, 2014, in the Western District of New York, the defendants, **STACY SAMUELS** and **KARONE JOHNSON**, did knowingly, intentionally and unlawfully possess with the intent to distribute, and distribute, fifty (50) grams or more of methamphetamine, and five hundred (500) grams or more of a mixture and substance containing methamphetamine, Schedule II controlled substances.

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A), and Title 18, United States Code, Section 2.

COUNT 4

(Attempt to Export Methamphetamine)

The Grand Jury Further Charges That:

On or about March 20, 2014, in the Western District of New York, and elsewhere, the defendants, **STACY SAMUELS** and **KARONE JOHNSON**, did knowingly, intentionally and unlawfully attempt to export from the United States to a place outside the United States, that is, Canada, fifty (50) grams or more of methamphetamine, and five hundred (500) grams or more of a mixture and substance containing methamphetamine, Schedule II controlled substances, in violation of Title 21, United States Code, Sections 953(c), 960(a)(1) and 960(b)(1)(H).

All in violation of Title 21, United States Code, Section 963 and Title 18 United States Code, Section 2.

FORFEITURE ALLEGATION

The Grand Jury Alleges That:

Upon conviction of any the controlled substance offenses alleged in Counts 1 through 4 of this Superseding Indictment, the defendants, **STACY SAMUELS** and **KARONE JOHNSON**, shall forfeit to the United States any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of said violations and any

and all property used, and intended to be used, in any manner or part, to commit or to facilitate the commission of said violations, including, but not limited to the following:

CURRENCY:

- a. The sum of three thousand, five hundred (\$3,500.00) dollars United States currency.

VEHICLES:

- a. one (1) 2008 Mazda CX9, bearing Ontario plate BSMM092, registered to Monkey Business, Ltd., and silver in color as observed by law enforcement on March 20, 2014 at Rainbow Bridge Port of Entry, Niagara Falls, New York; and
- b. one (1) 2003 Hyundai Tiburon, bearing Ontario plate BSNE867, registered to Monkey Business, Ltd., and blue in color as observed by law enforcement on March 20, 2014 at Rainbow Bridge Port of Entry, Niagara Falls, New York.

SUBSTITUTE ASSETS

If any of the property described above as being subject to forfeiture, as a result of any act or omission of the defendants:

- (1) cannot be located upon the exercise of due diligence;
- (2) has been transferred or sold to, or deposited with, a third person;
- (3) has been placed beyond the jurisdiction of the Court;
- (4) has been substantially diminished in value; or
- (5) has been commingled with other property which cannot be divided without difficulty.

It is the intention of the United States to seek forfeiture of any other property of said defendants up to the value of the above forfeitable property.

**All pursuant to Title 21 United States Code, Sections 853(a)(1), 853(a)(2) and
853(p).**

DATED: Buffalo, New York, August 6, 2014.

WILLIAM J. HOCHUL, JR.
United States Attorney

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A TRUE BILL:

s/FOREPERSON